

**STATE OF LOUISIANA
DIVISION OF ADMINISTRATIVE LAW
ETHICS ADJUDICATORY BOARD**

BOARD OF ETHICS

*** DOCKET NO. 2020-8299-ETHICS-A**

IN THE MATTER OF

GLENN DALE BRIDGES

*** AGENCY TRACKING NO. 5120-047**

DECISION AND ORDER

The Louisiana Board of Ethics, in its capacity as the Supervisory Committee on Campaign Finance Disclosure, requested a hearing to have the Ethics Adjudicatory Board determine whether Glenn Dale Bridges failed to file his 10-G and 40-G campaign finance disclosure reports by the eleventh day after they were due, in connection with his 2019 candidacy for Tangipahoa Parish Council, District 9. The Louisiana Board of Ethics proved by clear and convincing evidence that Glenn Dale Bridges failed to file the reports as alleged. Pursuant to Louisiana Revised Statutes (La. R.S.) 18:1505.4(A)(4)(b), the Louisiana Board of Ethics is authorized to impose an additional civil penalty not to exceed \$10,000 against Glenn Dale Bridges for each report he failed to timely file.

APPEARANCES

The hearing in this matter was conducted March 19, 2021, in Baton Rouge, Louisiana, before the Ethics Adjudicatory Board, Panel A.¹ Charles E. Reeves Jr., counsel for the Louisiana Board of Ethics, appeared for the hearing. Though properly noticed, Glenn Dale Bridges did not appear for the hearing.²

¹ The panel consisted of administrative law judges A. Brock Avery (presiding), Lance B. Vinson, and Sherlyn D. Shumpert.

² The *Conference Report and Order* setting this matter for hearing and Division of Administrative Law correspondence notifying Mr. Bridges of the hearing date and time were mailed to his last known address (39339 Lees Landing Road, Ponchatoula, Louisiana 70454-5923) on January 5, 2021. These documents are parts of the record in this matter; the

STATEMENT OF THE CASE

The Louisiana Board of Ethics (BOE) in its capacity as the Supervisory Committee on Campaign Finance Disclosure (BOE), imposed civil penalties on Glenn Dale Bridges (Respondent) for failing to timely file two campaign finance disclosure reports in connection with his 2019 candidacy for Tangipahoa Parish Council, District 9. One report was due ten days before the general election (10-G report), and one was due forty days after the general election (40-G report). The BOE then requested a hearing to have the Ethics Adjudicatory Board (EAB) determine whether Respondent failed to file his 10-G and 40-G reports by the eleventh day after they were due, which may subject him to an additional civil penalty not to exceed \$10,000 for each report, as authorized by La. R.S. 18:1505.4(A)(4)(b).

At the hearing, counsel for the BOE offered and introduced thirteen exhibits, which were admitted into evidence.³ Counsel presented the case on behalf of the BOE, the record was closed, and the matter was submitted for decision.

This adjudication is conducted in accordance with the Code of Governmental Ethics, La. R.S. 42:1101, *et seq.*, the Campaign Financial Disclosure Act (CFDA), La. R.S. 18:1481, *et seq.*, the Administrative Procedure Act, La. R.S. 49:950, *et seq.*, and the enabling legislation of the Division of Administrative Law, La. R.S. 49:991, *et seq.*

FINDINGS OF FACT

- 1) Respondent qualified as a candidate for Tangipahoa Parish Council, District 9, in the October 12, 2019, primary election.⁴ Respondent received thirty-one percent of the vote in the primary election and qualified to participate in the November 16, 2019, general

Board of Ethics included them in BOE Exhibit 12, an exhibit that was admitted into evidence.

³ All of the exhibits had been certified by affidavit to be true and correct copies of the BOE records. BOE-1 (March 2, 2020, affidavit of Carolyn Abadie Landry, Executive Secretary for the BOE).

⁴ See BOE-2.

election.⁵ Respondent was unsuccessful in the general election.

- 2) When he qualified as a candidate in the October 12, 2019, primary election, Respondent acknowledged that he was subject to the provisions of the CFDA.⁶
- 3) Respondent's campaign received multiple, individual contributions exceeding two hundred dollars.⁷
- 4) Respondent was required to file a 10-G report by November 6, 2019, the tenth day prior to the November 16, 2019, general election.⁸
- 5) Respondent was required to file a 40-G report by December 27, 2019, the fortieth day after the November 16, 2019, general election.⁹
- 6) Respondent did not file his 10-G report by the November 6, 2019, deadline, and he did not file his 40-G report by the December 27, 2019, deadline.¹⁰
- 7) On February 28, 2020, the BOE issued a *Late Fee Assessment Order* to Respondent that (a) assessed a late fee of \$1,000 and (b) ordered him to file a 10-G report within twenty days of his receipt of the order.¹¹ The *Late Fee Assessment Order* was mailed to Respondent at the address provided on his *Notice of Candidacy*: 39339 Lees Landing Road, Ponchatoula, Louisiana 70454; it was delivered on March 2, 2020.¹² Respondent was notified in the letter accompanying the *Late Fee Assessment Order* that he could be subject

⁵ BOE-3, p. 4.

⁶ BOE-2, p. 5.

⁷ BOE-5 (BOE's October 14, 2020, *Request for Hearing*), Exhibit No. 1 (Respondent's report listing campaign contributions and expenditures/disbursements for the period September 3 – 22, 2019).

⁸ See BOE-4 (Schedule of Reporting and Filing Dates for Candidates & PACs Supporting or Opposing Candidate), p. 1, and La. R.S. 18:1495.4(B)(5).

⁹ See BOE-4, p. 1, and La. R.S. 18:1495.4(B)(6).

¹⁰ BOE-9 (Affidavit of Angela Newsom, Director of Campaign Finance for the BOE, stating that, as of February 24, 2021, Respondent had still not filed a 10-G or 40-G report). As of the date of the hearing, there was nothing in the record showing that Respondent had filed the 10-G or 40-G reports.

¹¹ BOE-7.

¹² *Id.* at p. 3.

to “an additional \$10,000 penalty” if he failed to file the 10-G report.¹³

8) On July 15, 2020, the BOE separately issued a *Late Fee Assessment Order* to Respondent that (a) assessed a late fee of \$1,000 and (b) ordered Respondent to file a 40-G report within twenty days of his receipt of the order.¹⁴ The *Late Fee Assessment Order* was mailed to Respondent at 39339 Lees Landing Road, Ponchatoula, Louisiana 70454; it was delivered on July 17, 2020.¹⁵ Respondent was notified in the letter accompanying the *Late Fee Assessment Order* that he could be subject to “an additional \$10,000 penalty” if he failed to file the 40-G report.¹⁶

9) On December 21, 2020, the BOE mailed a copy of the *Request for Hearing* to Respondent by certified mail, return receipt requested, at 39339 Lees Landing Road, Ponchatoula, Louisiana 70454; it was delivered on December 23, 2020.¹⁷

CONCLUSIONS OF LAW

Respondent knowingly failed to file a 10-G report and a 40-G report by the eleventh day after the reports were due. For these failures, the BOE is authorized to impose additional civil penalties against Respondent as allowed by La. R.S. 18:1505.4(A)(4)(b).

Adjudicatory hearings under La. R.S. 18:1505.4(A)(4)(a)-(b) cover two kinds of campaign finance disclosure reports candidates must file in connection with elections. La. R.S. 18:1505.4(A)(4)(a) addresses reports that candidates must file between the time the candidate qualified for the election and the election day. La. R.S. 18:1505.4(A)(4)(b) addresses “other reports” candidates must file in connection with an election at other times. In either case, the BOE

¹³ *Id.* at p. 1.

¹⁴ BOE-8, p. 2.

¹⁵ *Id.* at p. 3.

¹⁶ *Id.* at p. 1.

¹⁷ BOE-5, p. 15.

must prove by clear and convincing evidence¹⁸ that the candidate knowingly¹⁹ failed to file a required report within the six or eleven-day period following when it was due, respectively.

Respondent was a candidate for the office of Tangipahoa Parish Council, District 9, which is an “any other” level office.²⁰ Every candidate (or his campaign treasurer) for an “any other” level office is required to file certain campaign finance disclosure reports by the statutory deadlines.²¹ Failure to timely submit required reports constitutes a violation of the CFDA.²²

Because Respondent, as a candidate for an “any other” level office, received a campaign contribution in excess of two hundred dollars, he was required to file certain campaign finance disclosure reports (reports of contributions and expenditures), including the 10-G and 40-G reports.²³ Respondent was required to file a 10-G report no later than November 6, 2019, ten days prior to the November 16, 2019, general election.²⁴ Respondent was required to file a 40-G report no later than December 27, 2019, forty days after the November 16, 2019, general election.²⁵ Respondent failed to file the 10-G report by the statutory deadline or by the eleventh day after it was due. Respondent also failed to file the 40-G report by the statutory deadline or by the eleventh day after it was due.

If, after conducting an adjudicatory hearing, the EAB determines that Respondent knowingly failed to file a required campaign finance disclosure report within the applicable time

¹⁸ See La. R.S. 42:1141.5(C). “‘Clear and convincing evidence’, in general, means that the fact of guilt must be proven to a greater degree than by ‘a mere preponderance of the evidence’ but less than by ‘beyond a reasonable doubt.... The standard requires that the existence of the disputed fact be [h]ighly probable, that is, much more probable than its non-existence.’” *Louisiana State Bar Ass’n v. Edwins*, 329 So. 2d 437, 442 (La. 1976).

¹⁹ La. R.S. 18:1505.4(A)(1).

²⁰ An “any other” level office is any office that is not a “district office” or a “major office.” See La. R.S. 18:1483(7) and (11) (defining “district office” and “major office,” respectively) and BOE-4, p. 2.

²¹ La. R.S. 18:1495.4.

²² La. R.S. 18:1505.1(B).

²³ See La. R.S. 18:1484(2)(b).

²⁴ La. R.S. 18:1495.4(B)(5); BOE-4, p. 1.

²⁵ La. R.S. 18:1495.4(B)(6); BOE-4, p. 1.

period, then the BOE may impose an additional civil penalty not to exceed \$10,000 against Respondent for each report that he failed to timely file.²⁶ Failure to file a required report within three days after the final date for filing creates a rebuttable presumption of intent to not file the report.²⁷ Nothing in evidence rebuts this statutory presumption.

With the benefit of the unrebutted statutory presumption of intent not to file, the BOE proved by clear and convincing evidence that Respondent knowingly violated the CFDA by failing to file his 10-G report by the November 6, 2019, deadline, and his 40-G report by the December 27, 2019, deadline. As a result, the BOE is authorized to impose an additional civil penalty of up to \$10,000 for each report as authorized by La. R.S. 18:1505.4(A)(4)(b).

²⁶ La. R.S. 18:1505.4(A)(4).

²⁷ La. R.S. 18:1505.1(A).

ORDER

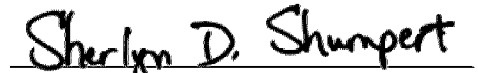
IT IS ORDERED that the Louisiana Board of Ethics, in its capacity as the Supervisory Committee on Campaign Finance Disclosure, is authorized to impose an additional civil penalty not to exceed \$10,000 against Glenn Dale Bridges for failing to file his 10-G campaign finance disclosure report by the sixth day after it was due.

IT IS ORDERED that the Louisiana Board of Ethics, in its capacity as the Supervisory Committee on Campaign Finance Disclosure, is authorized to impose an additional civil penalty not to exceed \$10,000 against Glenn Dale Bridges for failing to file his 40-G campaign finance disclosure report by the eleventh day after it was due.

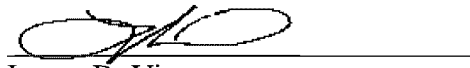
Rendered and signed on April 23, 2021, in Baton Rouge, Louisiana.



A. Brock Avery
Presiding Administrative Law Judge
Ethics Adjudicatory Board, Panel A



Sherlyn D. Shumpert
Administrative Law Judge
Ethics Adjudicatory Board, Panel A



Lance B. Vinson
Administrative Law Judge
Ethics Adjudicatory Board, Panel A

NOTICE OF TRANSMISSION OF DECISION OR ORDER

I certify that on Monday, April 26, 2021, I have sent a copy of
this decision/order to all parties of this matter.

Clerk of Court

Division of Administrative Law

REVIEW RIGHTS

Requests for rehearing, reopening, or reconsideration are subject to the procedures, timing requirements, and legal grounds provided in Louisiana Revised Statutes (La. R.S.) 49:959, with the time for filing calculated pursuant to Louisiana Code of Civil Procedure article 5059. To determine your review rights, you should act promptly and seek legal advice.

To request rehearing, reopening, or reconsideration, please send it to one of the addresses indicated below:

EMAIL documents to:
EABprocessing@adminlaw.state.la.us

FAX documents to:
(225) 219-9820

MAIL documents to:
DAL – EAB Section
P. O. Box 44033
Baton Rouge, LA 70804-4033

If you do not request rehearing of your decision or your rehearing request is denied, you have the right to seek judicial review in accordance with La. R.S. 42:1142(A)(1), with the time for requesting judicial review calculated pursuant to La. C.C.P. art 5059. To determine your review rights, you should act promptly and seek legal advice.